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February 20, 2018

## BY ECF

The Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. James David Williams et al; 16 Cr. 436 (KMW)

Dear Judge Wood:

I represent James David Williams in the above-referenced matter.

The purpose of this letter is to respectfully request a temporary modification of Mr. Williams' bail conditions. Presently, his travel is restricted to the Southern and Eastern Districts of New York, the District of Nevada, the District of Arizona and the Central District of California. It is respectfully requested that his travel restrictions be extended such that he may travel with his daughter to her upcoming cheerleading competition in Fresno, California, which is in the Eastern District of California. His proposed travel is to leave Southern California, where he resides, on Friday, February 23, 2018 and return home on Sunday, February 25, 2018.

I have discussed this application with Pretrial Services and the Government and neither objects to the request.

Respectfully submitted,

/s/

Anthony Cecutti